

RADON NEWS

Spring 2004 - Issue #12

NJDEP Bureau of Environmental Radiation - Radon

The New Database: Benefits and Highlights

In the last issue of *Radon News*, we described key new policies and changes that would be seen as the Radon Section transitioned to a new Oracle database. Now that the database is fully operational and the policies and procedures are in effect, we would like to highlight them as they will affect all radon professionals.

The radon database contains testing and mitigation data from all buildings tested or mitigated in New Jersey, billing information, and comprehensive certification information for all businesses and individuals. There is a large volume of data as the Radon Section processes approximately 700 testing and mitigation applications, 50,000 tests and 3,000 mitigations per year.

Certification Information

We have used the transition to the new database as an opportunity to improve and streamline the certification process. Many features of the new database, including those mentioned below, will be beneficial to both the Radon Section and the certified radon professionals and businesses. We would appreciate your cooperation during the transition and encourage any feedback you may have.

Instead of receiving a reminder letter regarding your certification renewal, you will receive an invoice and application approximately 60 days before the expiration date. New applications have been developed for all certification categories. You must tear off the bottom portion of the invoice, follow the directions on the insert and send your payment and application to the NJDEP Radon Section, PO Box 415, Trenton NJ 08625-0415. (Please disregard the Department of Treasury's mailing directions on the invoice and send the payment and application to the Radon Section.)

If you find any problems with either the certificates or invoices, please let us know. We have already heard from a few individuals and businesses and we are working to correct the problems they discovered.

The Radon Section must receive all renewal applications at least 30 days before the expiration date. Applications will be reviewed on a first-come, first-served basis. Letters for certification issues that were previously prepared by manually typing the address and other information on a form letter (like the deficiency letter) are now being generated through automatic mail merge documents. When your application is approved, your certificate (a new design) will be printed and mailed directly to you by the Department of Treasury.

If the renewal application is submitted less than 30 days before the expiration date, it may not be reviewed on time. If that is the case, once the expiration date arrives, the database will automatically generate an expiration letter.

If you receive an expiration letter, you must cease all radon activities until your application is approved and you are certified. Applications received less than 30 days from the expiration date will remain in the queue to be processed; there is no need to submit an additional application and fee.

Please note that copies of individual expiration letters will no longer be sent to businesses. Businesses should be tracking the expiration dates of ALL of their radon professionals, both affiliated and employed. If a business has a question as to the status of a person's certification, please feel free to call the Radon Section.

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**New Jersey
Department of
Environmental
Protection**

**Radiation
Protection and
Release
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Element**

**Bureau of
Environmental
Radiation**

**Radon Section
P.O. Box 415
Trenton, NJ
08625-0415
(800) 648-0394**

www.njradon.org



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Monthly Reporting

Another new policy is that all monthly reports are now submitted electronically and all data is electronically transferred to the new database. This eliminates the human error associated with manual data entry, and saves considerable time because the manual data entry and two rounds of proofreading are no longer needed. The database also has the capability of checking the items in the monthly report. For example, the database can determine if the correct number of duplicates and blanks were performed each month. This feature has not yet been implemented; we anticipate running a complete check of the monthly report using the new database capabilities within the next six months.

Assistance to You

All staff in the Radon Section can now instantly access information on the database, which makes it possible to provide improved assistance to callers on the Radon Information Line.

Questions relating to the certification process can now be directed to Shantha Shashidhara at (609) 984-5548 for individual applications or Mohammed Rahman at (609) 984-5509 for business applications.

We Want Your Comments!

We appreciate your patience while we continue to improve our database and the services we provide. Again, please bring to our attention any problems that you find with correspondence or documents so we can make any necessary changes. We welcome your suggestions and feedback on the new database and certification processes. Please direct written comments to Anita Kopera at anita.kopera@dep.state.nj.us or NJDEP Radon Section, PO Box 415, Trenton NJ 08625-0415.

Revision of Regulation Starts Up Again

The Radon Section has again taken up the revision of the radon regulation, N.J.A.C. 7:28-27.1 et seq. Development of the regulation was temporarily put on hold due to the implementation of the school radon testing law and creation of the new database during the last year.

The Radon Section has reviewed the comments provided by the regulated community in 2002, and a list of proposed changes to the current regulation is now being developed. We appreciate all the input provided in the first phase of the revision process, and look forward to cooperating with the regulated community in finalizing the new regulation. As noted on the DEP Radon Web site, comments can be provided at any time to the Rule Manager, Judy Morgan, at judy.morgan@dep.state.nj.us.

Update on School Testing Program

Hundreds of school districts throughout New Jersey have now tested their school buildings in compliance with the New Jersey School Testing Law (N.J.S.A. 18A:20-40), which requires that all public schools be tested by September 2005. The implementation of the new law has gone very smoothly, thanks in large part to the cooperation of radon businesses, school-district officials, the Department of Education, and other state agencies.

A few issues emerged that have required attention. Testers initially reported that doors and windows were often left open in school buildings during testing. In response to this concern, the DEP Radon Section highlighted a note on its school web site for school administrators, emphasizing that it is essential that administrators inform teachers of the importance of closed building conditions during testing, and that open doors and windows could invalidate test

results, possibly requiring re-testing in order to comply with the law.

The Radon Web site will be updated as these sorts of issues arise. It is therefore essential that school districts and radon businesses check the web site periodically to see if information or requirements have been updated..

In discussions with radon businesses, it became apparent that many schools were intending to delay testing until the 2004-05 school year. In cooperation with the Department of Education, a letter was e-mailed to all New Jersey school districts and charter schools on February 2, 2004, noting that delay might make it difficult to locate available testing resources during the last testing cycle, and reminding them again that open doors and windows during testing could invalidate the test results.

In response to some confusion about contractual arrangements, the Radon Section wants to clarify that schools or districts must contract with a DEP-certified radon business. This must be done in either of two ways:

- 1) Directly with the certified business;
- 2) Indirectly through another business, such as an environmental consultant, that subcontracts to a DEP-certified business. The consulting business must include the name of the certified business in the contract, and must

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**State of New Jersey
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**Radiation Protection
and Release Prevention
Element
Jill Lipoti, Ph.D.
Assistant Director**

**Judy Morgan
Editor**

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have a formal contract with the certified radon business.

In either case, copies of the contractual agreements must be kept on file by the certified radon business. Schools cannot contract directly with certified individuals under any circumstances.

Several questions were raised by radon businesses and school officials about details of testing requirements. In response, seven questions and answers were added to the Radon Section Web site on January 8, including the following two items.

—What are the kinds of deviations from EPA recommendations that the DEP will consider “acceptable?”

The DEP cannot anticipate all situations that schools will encounter in undertaking radon testing. In general, if a school makes a good faith effort to follow EPA recommendations, and seeks to create a reasonable alternative where necessary, the school should not have to worry that they will be required to retest. Schools may always contact the Radon Section, (800) 648-0394, for assistance if they encounter difficulties in following EPA recommendations.

—What should be done if some classroom windows were left open during the testing period?

If windows in a room are open during the testing period, this should be noted by the tester on the chain of custody form. The measurement business must then note this on their reports to schools along with the statement that the requirement of closed building conditions was not met, which may make the test results invalid. Parents or staff may question the test results in these cases, which may make it necessary to retest. The lack of closed building conditions must also be reported to the DEP in the business's monthly reports.

Relocation of ASD Fans

Recently a question was raised as to whether radon mitigators, if called to repair an old mitigation system in which the fan is located in the basement, must necessarily relocate the fan to comply with current requirements.

New Jersey's radon regulation refers to the EPA “Radon Mitigation Standards” (RMS), EPA 402-R-93-078, revised April 1994, as the standard for mitigations. Section 7.4 of the RMS states:

“The RMS shall not apply to radon mitigation systems installed prior to its effective date, except when a previously installed system is altered. ‘Altering’ radon mitigation systems does not include activities such as replacing worn-out equipment, or providing new filters, while leaving the remainder of the system unchanged...If a radon mitigation system is found that does not comply with current standards, contractors should recommend to clients that the system be upgraded or altered to meet current standards.”

Therefore, since replacing the fan does not in itself ‘alter’ the system, relocation is not required, but the certified radon mitigation business should strongly recommend to clients that the system be upgraded or altered to meet current standards.

Current standards require radon fans used in active soil depressurization (ASD) systems to be installed either outside the building, or inside the building but outside of occupiable space and above the conditioned (heated/cooled) spaces of a building. This fan location is chosen to minimize the risk of radon entry into living spaces, which could result from leaks in radon fan housings or in the vent stack piping above the radon fan. The possible impact of simply replacing a fan located in the basement is

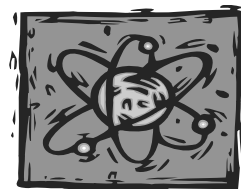
that a leak could severely increase radon exposure for the home's occupants since the concentration of radon in ASD pipes can be very high, often measured at several thousand pCi/L. This should be explained to clients as a rationale for relocating a fan so that it complies with current standards.

New Research of Interest

“Estimate of Annual Average Radon Concentration in the Normal Living Area from Short-Term Tests,” by Jing Chen, Radiation Protection Bureau, Health Canada, *Health Physics*, 85 (6), December 2003, p 740-744.

This study surveyed radon test results in 5,486 Canadian houses examining seasonal and spatial variations. It found that radon concentrations on the first and second floors were not significantly different, and that the ratio between radon concentrations in the basement and upstairs was 1.66 on average. This ratio is consistent with other studies, including a ratio of 1.64 between basement and upper floors based on measurements of more than 2,000 New York homes, a ratio of 1.99 from an analysis of 30,000 U.S. homes, and a ratio of 2.05 from a survey of more than 2,000 homes in the United Kingdom.

Based on a subsample of 3,850 houses, the study found that the average winter (December through February) radon concentration in the basement level was 50 per cent higher than the spring concentration, 42 per cent higher than the summer levels, and 16 per cent higher than the autumn levels.



Radon Certification Examination Test Dates

2004

<u>Day</u>	<u>Date</u>	<u>Time</u>	<u>Location</u>	<u>Filing Deadline</u>
Thursday	June 3	9:00 a.m.	HRDI Aud. 101	<i>Thursday, May 20</i>
Thursday	September 16	9:00 a.m.	HRDI Aud. 101	<i>Thursday, September 2</i>
Thursday	December 2	9:00 a.m.	HRDI Aud. 101	<i>Thursday, November 18</i>

Exams will be conducted at the Human Resources Development Institute in Trenton. To register, contact Kara Kroll, (609) 984-5424.

**NJDEP Radon Section
P.O. Box 415
Trenton, NJ 08625-0415**